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Via ECF
Via Messenger

May 20, 2014

The Hon. Laura Taylor Swain
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: *Universitas Education, LLC v. Nova Group, Inc.*, Case No. 11-1590-LTS (S.D.N.Y.)
Proposed Sur-Reply

Dear Judge Swain:

We represent Petitioner/Judgment Creditor Universitas Education, LLC ("Universitas") in the above action and write to respectfully request permission to submit a sur-reply to the reply papers recently submitted by Respondent Grist Mill Trust Welfare Trust Benefit Plan ("Grist Mill Trust") (Dkt. No. 434), including Declarations from Molly Carpenter, Barbara Korfel, and Matt Westcott.

Universitas makes their request because Grist Mill Trust's reply papers raise numerous factual and legal issues which were never raised in the opening motion papers. In order to afford reasonable time for some limited discovery (if necessary) on the new issues raised by the Grist Mill Trust, Universitas proposes that its sur-reply be due on June 13, 2014.

Respondents Grist Mill Trust and Nova Group Inc. both consent to Universitas' request. Counsel for Mr. Williams has withheld his consent pending review of Universitas' application for permission to submit a sur-reply.

Accordingly, Universitas respectfully requests the Court grant its request to submit a sur-reply as outlined above.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Paula K. Colbath'.

Paula K. Colbath
Partner